

May 31, 2024

VIA ECF

The Honorable Sarah J. Netburn  
United States Magistrate Judge  
U.S. District Court for the Southern District of New York  
Thurgood Marshall U.S. Courthouse, Room 430  
40 Foley Square  
New York, New York 10007

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***In re Terrorist Attacks on Sept. 11, 2001, Case No. 1:03-md-1570-GBD-SN (S.D.N.Y.)***

Dear Judge Netburn:

Al Rajhi Bank respectfully submits this letter regarding three of the Bank's May 7, 2024 filings (ECF Nos. 9788, 9789, and 9790) in support of the Bank's Renewed Motion to Dismiss (ECF No. 9786). Al Rajhi Bank requests the Court's authorization to refile the Bank's submissions with corrections in the same manner the Court has previously authorized Plaintiffs and other parties in this MDL to refile corrected versions of their filings. *See* ECF Nos. 9388, 9520, and 9763.

In particular, in the Bank's Response to Plaintiffs' Corrected Averment of Jurisdictional Facts (ECF No. 9790), a small number of citations inadvertently cite to the incorrect exhibit number, omit an exhibit number, or fail to indicate whether the exhibit is Plaintiffs' or Al Rajhi Bank's exhibit; and two references to a 2004 translated letter mistakenly identify the letter as from 2003. In both the Bank's Response to Plaintiffs' Corrected Averment of Jurisdictional Facts and the Bank's Objections to Plaintiffs' Averment Exhibits (ECF No. 9788-1), one of the Bank's repeated objections to Plaintiffs' exhibits containing Bates numbers beginning with "NL" was unintentionally omitted with respect to Plaintiffs' Exhibit 141. Finally, two of the Bank's exhibits identified in the Erb Declaration (ECF No. 9789) contain attachment errors, and a few additional exhibits contain image-quality issues that appear to be the result of converting them to PDF/A format and reducing their size to comply with ECF filing requirements.

Al Rajhi Bank seeks authorization to make these corrections to assist the Court and the Parties. The Bank informed counsel for Plaintiffs of these errors and provided them with errata sheets for the respective documents. Counsel for Plaintiffs indicated that Plaintiffs do not object to Al Rajhi Bank's request to refile corrected versions of these submissions.

The Bank thus respectfully requests authorization to refile, under seal, corrected versions of the Erb Declaration and accompanying exhibits in support of the Bank's renewed motion (ECF No. 9789), the Bank's Response to Plaintiffs' Corrected Averment of Jurisdictional Facts (ECF No.

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9790), and the Erb Declaration and accompanying Objections to Plaintiffs' Averment Exhibits (ECF No. 9788).

Respectfully submitted,

*/s/ Nicole Erb*

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cc: Counsel of Record (via ECF)